

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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|---|---|-------------------------------|
| PHILADELPHIA INDEMNITY INSURANCE COMPANY, | : | Docket No.: 1:21-cv-11572-WGY |
|   | : |                               |
| Plaintiff & Defendant-in-Counterclaim,    | : |                               |
|   | : |                               |
| -vs.-                                     | : |                               |
|   | : |                               |
| BAS HOLDING CORP.,                        | : |                               |
|   | : |                               |
| Defendant & Plaintiff-in-Counterclaim.    | : |                               |
|   | : |                               |

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**DECLARATION OF ATTORNEY ALEXANDER G. HENLIN**  
**IN SUPPORT OF PLAINTIFF'S OPPOSITION TO BAS HOLDING CORP.'S**  
**MOTION FOR SUMMARY JUDGMENT**

Alexander G. Henlin, Esq., an attorney-at-law duly admitted to the bar of this Court, upon his oath does depose and say:

1. I am over eighteen (18) years of age and make all of the following statements on my own personal knowledge. I am a member in the firm of Sulloway & Hollis, P.L.L.C., and I am counsel of record to Philadelphia Indemnity Insurance Company ("PIIC") in this action.

2. Attached as **Exhibit V** is a true and correct copy of e-mail chains dated February 3, 2022 regarding the agreement of the parties on the actual cash value and replacement-cost value of the "State Building" in lieu of reference.

**I AFFIRM THE TRUTH OF THE FOREGOING STATEMENTS UNDER THE PAINS AND PENALTIES OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THIS 18<sup>th</sup> DAY OF FEBRUARY 2022.**

/s/ Alexander G. Henlin  
Alexander G. Henlin (BBO # 660474)  
Sulloway & Hollis, P.L.L.C.  
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**Certificate of Service**

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants, on this 18<sup>th</sup> day of February 2022.

/s/ David W. Zizik

David W. Zizik (BBO # 540780)